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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

In Re:	§	
Regina Ann Johnston	§	Case No. 13-70352-hdh-13
	§	Chapter 13
Debtor	§	

DEBTOR'S MOTION TO EXTEND AUTOMATIC STAY

Comes Now Debtor, by counsel, and for this Motion states as follows:

1. Debtor filed for relief under Chapter 13 in the Northern District of Texas. This is a core proceeding.
2. Debtor was a debtor in a prior case during the preceding year. To-wit: Chapter 13, Case No. 11-70383-HDH-13 filed on September 20, 2011.
3. Debtor seeks an extension of the automatic stay imposed for 30-days pursuant to 11 U.S.C. §362(c)(3)(A), as to all creditors until further order or discharge to effectuate an orderly reorganization, pursuant to 11 U.S.C. §362(c)(3)(B).
4. Debtor's prior case was dismissed for: Failure to make payments. Debtor had back surgery and fell behind with her trustee's payment of \$322.00 in June 2013. At that same time, her child support was not consistent. She accumulated medical debt that she could not pay.
5. The following changes of circumstances demonstrate that the Debtor can perform this plan and are likely to complete the case successfully: Debtor's payment decreased to \$272.00, due to owing less on her vehicle. Debtor and her son are receiving \$2,128.00 from Social Security and she is receiving regular monthly child support payments of \$681.24.

WHEREFORE, Debtor requests this Court enter its order continuing the automatic stay under §362(a) in this proceeding as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2) or a motion for relief is granted under §362(d).

Respectfully submitted,

/s/Monte J. White, Attorney for Debtor

CERTIFICATE OF CONFERENCE

On September 20, 2013, the Office of Monte J. White & Associates, PC, contacted Marc McBeath, Counsel for the Chapter 13 Trustee and was advised that the Trustee does not oppose the motion.

/s/Monte J. White, Attorney for Debtor

CERTIFICATE OF SERVICE

A true and exact copy of the foregoing Motion and Notice of Hearing was served electronically by the ECF System or by First Class Mail on September 24, 2013, on all parties on the mailing matrix:

/s/Monte J. White, Attorney for Debtor

Arlington Medical Hospital
800 W. Randol Mill Rd
Arlington, TX 76012

First National Bank
PO Box 937
Killeen, TX 76540

TXU Electric
PO Box 650393
Dallas, TX 75265

Baylor Health Care System
3500 Gaston Ave
Dallas, TX 75246

First Source/Texas Health Arlin
1232 W State Rd #2
La Porte, IN 46350

Unique National Collection/Publ
119 E Maple St
Jeffersonville, IN 47130

Bill's Automotive
4901 Southwest Parkway
Wichita Falls, TX 76310-3218

IRS Special Procedures
1100 Commerce St., Room 951
Mail Stop 5029 DAL
Dallas, TX 75246

United Regional
Attn: Billing Dept.
1600 11th Street
Wichita Falls, TX 76301

Clinics of North Texas
PO Box 97547
Wichita Falls, TX 76307-7547

Kell West Regional Hospital
5420 Kell West Blvd
Wichita Falls, TX 76310

Verizon Wireless
Verizon Wireless Department/Att
PO Box 3397
Bloomington, IL 61702

Consumer Portfolio Svc
Attn: Bankruptcy
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Irvine, CA 92618

Kenwood Financial Services
1209 Orange Court
Wilmington, DE 19801

World Finance
928 Indiana
Wichita Falls, TX 76301

Dept of Education/Nelnet
121 S 13th St
Lincoln, NE 68508

Merrick Bank
PO Box 23356
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Dr. Danny Bartel
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Pinnacle Anesthesia Consultants
13601 Preston Road, Ste 900W
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Edfncl Svcs/nthea
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RJM Acquisition LLC/Scholastic
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